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June 12, 2023

United States Federal District Court
Clerk of Court's Office
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Room 2020
Trenton, New Jersey 08608

Re: Discover Bank v. Les Shayne a/k/a Leslie Jay Shayne,
Greenwood House, Estate of Charlotte Shayne
Civil Action #:3:18-cv-16020-RK-RLS


ecfhelp@njdcourts.gov

Dear Sirs or Madams:

Attached please find MOTION FOR SUMMARY JUDGMENT IN THIS CASE. BECAUSE A PART BROKE OFF MY COMPUTER, I WILL HAVE TO FILE THE EXHIBITS AND A SHORT MEMORANDUM TOMMORROW MORNING.

Also, please inform Judge Kirsh I received an MRI and the MRI RESULTS TODAY AND THEY ARE QUITE ALARMING AND BAD- AND I AM FURIOUS BECAUSE YOUR JUDGES AND MAGISTRATES CAUSED THIS BY DISCARDING AND IGNORING ALL MY DOCTOR'S STATEMENTS AND MEDICAL INFORMATION, AND THESE INJURIES ARE VERY SERIOUS, EXTENSIVE AND MOST PROBABLY PERMANENT. I WILL WRITE A DETAILED LETTER (NOT LONG) TOMMORROW AND SEND THE REPORT, BUT ASK HIM TO PLEASE HOLD UP ON EVERYTHING UNTIL HE RECEIVES THIS.

THANK YOU!

Sincerely,

Leslie Jay Shayne.
Attorney at Law, Pro Se

LJS/ljs
Clerk of Court New Jersey 061223
Enclosure (MOTION FOR SUMMARY JUDGMENT)
Cc: Kravitz, Lukanski, Murphy

Les Shayne, Pro Se, and on behalf of Charlotte Shayne, now deceased, as the named
Personal Representative of her Estate

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Discover Bank, Plaintiff

v.

Les Shayne, Pro Se,
Charlotte Shayne,
now deceased and represented by
her named Personal
Representative Les Shayne,
and Greenwood House,

Defendants.

CIVIL ACTION No: 3-18-CV-16020-RK-RLS

MOTION FOR SUMMARY JUDGMENT
PER RULE 56 OF THE FEDERAL RULES
OF CIVIL PROCEDURE
AND FOR SANCTIONS AGAINST DISCOVER
BANK AND GREENWOOD HOUSE FOR
FRAUDULENTLY AND KNOWINGLY BRINGING
THIS AND UNETHICALLY DECEIVING AND
TRYING TO FOOL THIS COURT, IN THAT THE
ACCOUNT (x5255) WAS ALREADY CLOSED
MONTHS BEFORE THIS (UNDISPUTED), AND
THEN STEALING/CONVERTING MY PERSONAL
ASSETS FRAUDULENTLY ALLEGING THEY WERE
MY MOM'S ASSETS WITH ABSOLUTELY NO
PROOF AND CONTRARY TO ALL THE PROOF
THAT THEY WERE AND ARE NOT MY MOM'S
ASSETS (INCLUDING ECF 86), WITH THE ORDERS
VERY CLEARLY NOT BEING VALID ANYWAY,
AS NO NEW JERSEY COURT (INCLUDING THIS
ONE) HAS JURISDICTION, AND CONVERTING MY
PERSONAL ASSETS OF APPROXIMATELY
\$300,000 BASED ON A REQUESTED
FREEZE OR TURNOVER OF \$64,511.75,
WITH NO DUE PROCESS OF LAW, AND IN DIRECT
VIOLATION OF UEFJA AND WITHOUT ANY
PAPERS REQUIRED BY LAW (WRIT OF
EXECUTION, LEVY, ETC.), AND RESULTING IN
THE CONTINUED ILLEGAL HOLDING OF
MY MOM BY KRAVITZ AND HIS NURSING HOME

) AND RESULTING IN HER BLINDING,TORTURE
) AND DEATH, LOSS OF MY HEALTH, RETIREMENT,
) AND ALL THESE FACTORS SHOULD BE TAKEN
) TAKEN INTO ACCOUNT WITH REGARD TO THE
) SANCTIONS, AND THE FACT I WAS CRIPPLED
) FINANCIALLY AND COULD NOT HIRE A NEW
) JERSEY LAWYER FOR THIS MATTER AND THE
) CIVIL CASE APPEAL (BOTH SHOULD
) HAVE BEEN KNOCKED OUT IMMEDIATELY,
) AS THEY WERE BOTH SURE WINNERS),
) AS THIS WAS A SINFUL
) MISREPRESENTATION/LIE/CHARADE
) AND THEY SHOULD BE SANCTIONED
) ACCORDINGLY

TO: THE HONORABLE JUDGE ROBERT KIRSH, DISCOVER ATTORNEYS DAVID MURPHY AND JOHN LUKANSKI, AND GREENWOOD HOUSE ATTORNEYS JAMES KRAVITZ, RICHARD J. KRAVITZ AND ALLISON HOLLOWS:

YOU WILL PLEASE TAKE NOTICE that the undersigned Petitioner, Les Shayne, on his behalf, Pro Se, and on behalf of his Mother Charlotte Shayne, deceased, as the named Personal Representative of her Estate, will move before The Honorable Judge Robert Kirsch for an Order from this Court TO GRANT THIS OBVIOUS MOTION FOR SUMMARY JUDGMENT, AS THERE IS NO GENUINE ISSUE OF MATERIAL FACT CONCERNING THE ONE REQUEST THAT THE DEFENDANT GREENWOOD HOUSE MADE TO INITIATE THIS SO-CALLED FREEZE OR TURNOVER OF THE ASSETS IN ACCOUNT x5255 TO HIS FIRM'S TRUST ACCOUNT ON THE ASSETS IN ACCOUNT x5255 (EXHIBIT 1), which initiated this action, and this was the sole thing he asked for, and his sole request in this matter. That account was already closed out MONTHS EARLIER AND ON February 16, 2018, DISCOVER BANK ISSUED A CHECK IN THE AMOUNT OF \$67,580.55 (EXHIBIT 2) for the funds in that Account. Account x5255 WAS ALWAYS AN ACCOUNT FOR MY MOM-IT WAS DESIGNATED AS SUCH, REPORTED TO THE COURT AS SUCH, AND ACCOUNTED TO THE OCONEE COUNTY PROBATE COURT AND EVERY COURT AS SUCH. THAT IT WAS OPENED IN MY NAME BECAUSE LAMPL HAD ALREADY STOLEN, WITH NO LEGAL OR ANY AUTHORITY, MONIES FROM A JOINT ACCOUNT OWNED BY MY MOM AND I, APPROXIMATELY \$26,000, AND SHE SPENT APPROXIMATELY \$1-\$1 ½ MILLION DOLLARS OF MY MOM'S MONEY ALTHOUGH SHE WAS NOT LEGALLY AUTHORIZED TO SPEND ANY, AND SHE NEVER POSSESSED A VALID POWER OF ATTORNEY OR VALID APPOINTMENT IN NEW JERSEY, AS FOUND BY THE COURT AND CONTAINED IN A COURT ORDER, AND WILL BE PROVEN WITH 100% CERTAINTY IN MY JURISDICTIONAL MOTION. SO, THIS ACCOUNT WAS NOT MY PERSONAL ACCOUNT AS KRAVITZ WROTE IN THE LETTER, BUT IT WAS AN ACCOUNT FOR MY MOM, AND THE ACCOUNT WAS CLOSED OUT MONTHS BEFORE THIS LETTER WAS WRITTEN BY KRAVITZ, AND DISCOVER BANK ISSUED THE CHECK TO ME REGARDING THESE FUNDS- \$67,580.55- ON FEBRUARY 16, 2018 (EXHIBIT 2), AND THIS CHECK WAS SENT TO ME IN SOUTH CAROLINA ON MY MOM'S BEHALF, DEPOSITED IN A LOCAL BANK, ON MY MOM'S BEHALF-

EVERY PENNY SATISFACTORILY ACCOUNTED FOR, AND MUCH OF IT PLACED IN A FUNERAL AND BURIAL ACCOUNT FOR MY MOM, AND USED FOR HER TRANSPORT TO SOUTH CAROLINA AFTER THE DEFENDANT GREENWOOD HOUSE, WHICH FALSELY IMPRISONED HER THERE WITH NO LEGAL AUTHORITY TO DO SO, TORTURED AND KILLED HER, AND HER FUNERAL AND HER BURIAL EXPENSES. THE MONEY WAS TRANSFERRED TO ME PER MY VALID COURT APPOINTMENT AS MY MOM'S CONSERVATOR AND GUARDIAN AND I ALSO POSSESSED 3 VALID POWERS OF ATTORNEY.

AS A RESULT OF THIS LETTER AND THE REQUESTED FREEZE OR TURNOVER, I HAVE DONE A FAIR AMOUNT OF RESEARCH ON THIS, AND I HAVE FOUND NO LEGAL AUTHORITY TO SUBSTANTIATE, OR AS A BASIS FOR, A "FREEZE", SO THERE WOULD HAVE BEEN NO LEGAL BASIS FOR THAT REQUEST BY KRAVITZ, SO SUMMARY JUDGMENT SHOULD BE ISSUED ON THAT BASIS AS WELL, AND WHAT DISCOVER DID WAS TAKE UNLAWFULLY, WITHOUT ANY BASIS-WITHOUT DUE PROCESS-TAKE POSSESSION OF MY PERSONAL FUNDS AND DEPRIVE ME OF USE OF THESE FUNDS, AND THAT IS CONSIDERED CONVERSION. WHAT DISCOVER BANK DID IN THIS CASE, BY LEGAL DEFINITION, WAS A CONVERSION. IT IS EVEN CONSIDERED CONVERSION IF IT'S ON BEHALF OF A THIRD PERSON OR PARTY, IN THIS CASE THE CORRUPT UNETHICAL GREENWOOD HOUSE AND KRAVITZ.

THE DETAILED FACTS REGARDING THIS MONEY IS AS FOLLOWS:

LAMPL ONLY DISCLOSED 3 BANK ACCOUNTS OF MY MOM'S WHEN I WAS APPOINTED THE GUARDIAN AND CONSERVATOR FOR MY MOM. LAMPL PROVIDED ME THE NAMES OF THE 3 BANKS WHICH MY MOM HAD ACCOUNTS WITH- THE PNC BANK, SANTANDER BANK, AND FIRST BANK. I WROTE THOSE 3 BANKS TO SEND ME MY MOM'S MONIES SO I COULD USE THAT FOR HER CARE- SANTANDER BANK AND PNC BANK PROPERLY SENT ME THE MONEY- SANTANDER sent me a check on 2/24/2017 for \$38, 957.76 (EXHIBIT 3) WHICH I SENT TO DISCOVER BANK ON MARCH 10, 2017. PNC SENT ME A CHECK FOR \$25,553.99 AND ON MARCH 8, 2017 I SENT THAT TO DISCOVER BANK WITH THAT TRANSMITTAL LETTER DATED MARCH 8, 2017- (EXHIBIT 4). THESE WERE DEPOSITED INTO ACCOUNT x5255 AT DISCOVER BANK (AND THE FIRST STATEMENT FROM THAT ACCOUNT WITH THESE TRANSMITTED FUNDS INDICATING THEY WERE DEPOSITED WAS SENT BY KRAVITZ TO DISCOVER BANK REGARDING THIS INTENDED FREEZE (EXHIBIT 1). THIS CONTAINED BOTH OF THE CHECKS PLUS A LITTLE INTEREST. In the next few months, the account drew interest and because the account was drawing pretty good interest, it remained there, and I even added 2 small amounts of 2 of my Mom's Social Security checks. In early 2018, I requested Discover Bank to send me all these funds, and DISCOVER BANK ISSUED A CHECK TO ME IN THE AMOUNT OF \$67,580.55 for those funds (EXHIBIT 2). I immediately deposited them into an account at a bank 2 blocks away from me that was paying an excellent interest rate and offered free checking (EXHIBIT 5)- Oconee Federal. From that account, I established a Funeral and Burial ACCOUNT at Blue Ridge Bank (another local bank-EXHIBIT 6), and it's a good thing, because Kravitz and his band of thieves and killers were trying to fleece her of all her money, at one time charging her 300,000 a year for a tiny 1 bedroom 1 bath unit in a facility THAT OFFERED SUBSTANDARD AND KILLING CARE AND TORTURE OF HER, WITH 90% BAD REVIEWS, INCLUDING IMPROPERLY RESTRAINING PATIENTS, INADEQUATE AND ANTIQUATED

HEATING AND AIR CONDITIONING SYSTEM THAT WOULD BREAK AND CREATE HARDSHIPS FOR THE PATIENTS FOR DAYS, EMBEZZLEMENT BY THE DIRECTOR, NOT BATHING PATIENTS OFTEN ENOUGH AND PROPERLY, ETC., SO IT'S A GOOD THING I PROPERLY SECURED THAT MONEY SO MY MOM COULD BE PROPERLY BURIED AFTER THEY

TORTURED AND KILLED HER. **THAT WAS ALL THE BANK MONEY I**

HAD OF MY MOM'S. THE OTHER ACCOUNT THAT WAS AVAILABLE (First Bank)

WAS STOLEN IN ITS ENTIRETY WHEN AN INTERPLEADER WAS DONE IN NEW JERSEY STATE COURT- KRAVITZ SERVED AN EMPTY LOT- HE WAS ALLOWED TO INTERVENE AND SEAL THE RECORD BEFORE I WAS SERVED (UNLESS YOU CONSIDER SERVING AN EMPTY LOT WITH NO MAILBOX GOOD SERVICE)- I WAS NEVER PROPERLY HEARD ON THIS AND AWAY WENT THIS MONEY BASED UPON LAMPL'S ILLEGAL PAPERWORK- ALL GIVEN TO GREENWOOD HOUSE TO ILLEGALLY KEEP HER AND TORTURE AND KILL HER-AND GIVEN WITHOUT ANY VALID JUDGMENT AND AGAIN BY LYING AND FRAUD. THE COURT HEARD MY MOTION FOR SUMMARY JUDGMENT ON THIS A YEAR AND A HALF LATER- AND OF COURSE DENIED IT- AFTER A YEAR OR TWO DELAY, ON THE SAME DAY I WAS IN THE HOSPITAL WITH MY TERMINALLY ILL FRIEND, AND HEARD IN MY ABSENCE, AND OF COURSE DENIED. MORE NEW JERSEY JUSTICE. SO, THE PNC AND SANTANDER ACCOUNTS WERE THE ONLY BANK ACCOUNTS OF MY MOM'S I GOT AND I HAVE JUST TRACKED HERE AND TRACKED NUMEROUS TIMES THEIR PATH (INCLUDING ECF 86-THE FORENSIC ACCOUNTING)- ALL LEGAL-AND ALL ACCOUNTED FOR. SO THERE WAS NO MORE OF MY MOM'S MONIES OUT THERE OR TRANSFERRED OR TO BE TRANSFERRED, BUT THIS ACCOUNT WAS CLOSED OUT AND THE MONIES IN SOUTH CAROLINA, EVERY PENNY ACCOUNTED FOR TO THE COURTS. THE MONIES STOLEN BY DISCOVER BANK WERE ALL MY MONIES. THEY IMPROPERLY CONVERTED MY MONEY.

SO CORRUPT DISCOVER BANK'S RESPONSE TO THIS REQUEST TO TURNOVER THE FUNDS IN ACCOUNT x5255 AROUND (\$65,000) OR TO FREEZE IT, OF MY MOM'S MONEY, WAS TO CONVERT ALMOST \$300,000 OF MY PERSONAL FUNDS. THAT IS CALLED CONVERSION. THERE IS NO GENUINE ISSUE OF MATERIAL FACT- I AM ENTITLED TO SUMMARY JUDGMENT. ACCOUNT x5255- THE ONLY REQUEST THAT WAS MADE BY KRAVITZ-WAS CLOSED ALREADY AND THE FUNDS IN SOUTH CAROLINA (UNDISPUTED- NO GENUINE ISSUE OF MATERIAL FACT).

IN ADDITION, I WAS THE ONLY LEGAL GUARDIAN AND CONSERVATOR FOR MY MOM, AND I AUTHORIZED NO MONEY TO BE PAID TO GREENWOOD HOUSE. THERE IS NO ORDER ANYWHERE SAYING KRAVITZ GETS ALL THE MONEY HE CAN FIND OR GET HIS GRUBBY HANDS ON- AND I CERTAINLY DID NOT CONFESS ANY TYPE OF JUDGMENT TO HIM ON BEHALF OF MY MOM. IN FACT, I TRIED TO MOVE MY MOM, AND THE ONLY LEGAL COURT WITH JURISDICTION SAID THEY ILLEGALLY HELD MY MOM THERE, AND SHE WAS A DE FACTO RESIDENT OF SOUTH CAROLINA FROM MAY OF 2017 ON. THEY HELD HER THERE BASED ON INVALID PAPERS AND ILLEGALLY BY POLICE FORCE IN MARCH OF 2017. SO, MY MOM WAS FALSELY IMPRISONED THERE BY KRAVITZ- AND THE NEW JERSEY ORDERS ARE ALL INVALID ANYWAY. SO THAT ACCOUNT (x5255) WAS **NON-EXISTENT (long since gone and closed out) at the time of Kravitz's request, and there is no question his request could not possibly be complied with,**

and there is no other issue, involved no other funds or matter. With that in mind, SUMMARY JUDGMENT SHOULD BE GRANTED THERE IS NO GENUINE ISSUE AND THERE IS NO OTHER MATERIAL FACT. ALL UNDISPUTED.

BECAUSE THERE IS NO GENUINE ISSUE OF ANY MATERIAL FACT- THE ACCOUNT WAS CLOSED OUT MONTHS BEFORE THIS REQUEST AND THE REQUEST WAS IMPOSSIBLE- AND THERE IS NO QUESTION OF ANY MATERIAL FACT-AND THAT ENDED THE MATTER RIGHT THERE. NO LIES OR SUBMITTING HUNDREDS OF PAGES WORTH OF DOCUMENTS THAT ARE IRRELEVANT MEAN ANYTHING-THAT WILL NOT CHANGE THAT- AND KRAVITZ , THE GREENWOOD HOUSE AND DISCOVER BANK WERE ALL INVOLVED IN THE PAPERWORK MILL AND TRYING TO CONFUSE THE EASILY CONFUSED BIASED COURT. Certainly no attorney's fees should or can be awarded to either. The liars, cheaters. misleaders should not be rewarded for their charade/lies/little games they play-and should be sanctioned-their actions in this matter have led to Greenwood House continuing to illegally hold my Mom, torturing and killing her, my losing years of retirement, suffering injuries from all this typing, incredible stress, etc. and they should be sanctioned. A separate hearing should be held regarding this and regarding sanctions and damages incurred because of the lies, misrepresentation, game playing, conversion, etc. Obviously Summary Judgment MUST BE GRANTED AND THE MONIES RETURNED, WITH INTEREST IMMEDIATELY.

ALSO, I AM FILING A MOTION REGARDING JURISDICTION, AS IT IS 100% clear that certain that no New Jersey court had jurisdiction, so even the Order he relied (regarding Account x5255) on is not valid, and I don't even believe any Orders mention this Account specifically, but even if they did, that account was long since closed out, and the New Jersey Order invalid. In this case, jurisdiction or not, that account was already closed out and Summary Judgment should be granted.

AND TO CLEAR ONE THING UP- DISCOVER BANK AND KRAVITZ ALLEGE THEIR BASIS FOR CONVERTING MY PERSONAL MONIES WAS THAT THESE WERE MY MOM'S MONIES. THAT WAS ONE TOTAL COMPLETE LIE TO STEAL MY MONEY. FIRST THE FORENSIC ACCOUNTING (ECF 86), THAT JUDGE WOLFSON ORDERED, FOUND THAT NONE OF THE MONIES IN ANY OF THE ACCOUNTS DISCOVER BANK STOLE-WERE MY MOM'S MONIES. SECONDLY, IT WAS ABSOLUTELY IMPOSSIBLE FOR ANY OF THESE MONIES TO BE MY MOM'S BECAUSE THE ONLY MONIES I RECEIVED FROM ANY OF HER BANK ACCOUNTS WERE THOSE 2 ACCOUNTS FROM SANTANDER AND PNC TALLING AROUND \$64,000, THAT WERE IN ACCOUNT X5255, AND WE'VE TALKED ABOUT TODAY HERE. I RECEIVED NO OTHERS. SO IT WAS AND IS IMPOSSIBLE FOR THOSE MONIES TO BE MY MOM'S. JUST A LIE/PLAN FROM KRAVITZ AND DISCOVER BANK TO STEAL CONVEY ALL MY PERSONAL MONIES AND ADVANCE THAT TOTAL COMPLETE LIE BY UNETHICAL LAWYERS TO CONVERT MY MONIES FOR TAKING BASED ON MORE LIES BY KRAVITZ AND THE NURSING HOME.

RULE 56 STATES THAT THE COURT SHOULD STATE ON THE RECORD THE REASONS FOR GRANTING OR DENYING THIS MOTION. THERE CAN BE NO REASON FOR A BANK, ON BEHALF OF AN UNETHICAL, LYING DEFENDANT, KNOWING THIS ACCOUNT WAS CLOSED OUT AND EVEN KNOWINGLY ISSUING A CHECK FOR IT, CAN JUSTIFY OR DREAM UP SOME BOGUS REASON OR LIE IN ORDER TO CONVERT THIS MONEY-MY LIFETIME SAVINGS- TO TRY TO HAND IT OVER TO A LYING, CHEATING, KILLING CROOK WHO ILLEGALLY FALSELY IMPRISONED, TORTURED AND KILLED MY MOM. THEY WERE ALSO ORDERED BY THE ONLY COURT THAT HAD PROPER JURISDICTION TO RETURN MY MONEY TO ME AND WERE HELD IN CONTEMPT OF COURT BY THAT COURT-THEN EX PARTEED THE COURT TO STAY THEIR SANCTIONS AND IMMEDIATELY RAN UP TO CORRUPT NEW JERSEY. WHY WOULD A BANK WHICH WAS TOLD BY THE PROPER COURT TO RETURN THESE MONIES, ACT UNETHICALLY (DISOBEYING COURT ORDERS, BEING HELD IN CONTEMPT OF COURT, HAVING AN EX PARTE CONVERSATION WITH THE JUDGE AND GETTING HIM TO SIGN AN EX PARTE ORDER-ALL HIGHLY UNETHICAL), JUST TO SCREW THEIR OWN CUSTOMER??? THERE MUST BE SOME REASON THEY DID THIS, THEY ARE NOT AN IMPARTIAL INTERPLEADER- THEY HAVE FOUGHT SO HARD AND BEEN SUCH UNETHICAL LIARS TO ATTEMPT TO ENABLE KRAVITZ TO STEAL MY MONEY, FOR NO REASON. So, after all that, instead of informing Kravitz the account was closed out, and that ending this matter, they convert my lifetime liquid savings of 41 years of practicing law.

THIS WAS A VERY SIMPLE MATTER-and made extremely complicated by Kravitz and Murphy- both crooks, both liars, both unethical- and this Court was easily confused and biased throughout this proceeding.

ALL OF THIS ILLEGALLY BASED UPON THE ABSOLUTE LIE THAT GREENWOOD SENT SOME ORDERS FROM THE SURROGATE COURT AND STATE COURT IN NEW JERSEY, BUT NEITHER HAD JURISDICTION-THIS IS VERY CLEAR CUT- AND YOU CAN'T JUST SWOOP UP SOMEONE'S MONEY OUT OF THEIR ACCOUNT (AND THE VERY EXISTENCE OF THESE ACCOUNTS-MY PERSONAL ACCOUNTS IN SOUTH CAROLINA WERE ALSO ILLEGALLY/IMPROPERLY DISCLOSED BY DISCOVER BANK)-YOU STILL HAVE TO HAVE A LEVY/WRIT OF EXECUTION, AND IN THIS CASE THESE WERE SOUTH CAROLINA ASSETS CONVERTED (EXHIBIT 7)- AND UEFJA APPLIES, SO IN ORDER TO TAKE THOSE ASSETS THEY WOULD HAVE HAD TO COMPLY WITH UEFJA AND DOMESTICATE THE ORDER- IN SOUTH CAROLINA-AS THESE ARE SOUTH CAROLINA ASSETS- BUT MINE- AND NOT MY MOM'S-AND THIS WAS A TOTAL VIOLATION OF UEFJA)-AND DISCOVER BANK HAD ABSOLUTELY NONE OF THE ABOVE-AND HAD NO LEGAL BASIS OR AUTHORITY TO JUST TAKE MY MONEY-no Writ, no Levy, no Valid Court Orders, no domestication in South Carolina (because they couldn't—they had no Court Orders to domesticate on or before October 2, 2018-because none existed on October 2, 2018, when my personal money was frozen, AND NO NEW JERSEY COURT HAD OR HAS JURISDICTION, INCLUDING THIS COURT, SO NO ORDERS ARE VALID TO AUTHORIZE THE TAKING OF ANY MONIES. THIS COURT SHOULD JUST FOCUS ON THE FACT) THAT IT WAS A REQUESTED FREEZE OR TURNOVER OF ACCOUNT x5255, AND THAT'S THE ONLY THING KRAVITZ REQUESTED- SEE LETTER (EXHIBIT 1), AND THAT ACCOUNT WAS ALREADY CLOSED OUT, THE FUNDS

SAFELY, ON BEHALF OF MY MOM, IN SOUTH CAROLINA.
CASE OVER. CASE ENDED. NO GENUINE ISSUE OF
MATERIAL FACT.

Clearly, there is no genuine issue of fact that this account was closed out way before this October 2, 2018 request for turnover or “freeze” by Kravitz, and his Court is mandated to grant Summary Judgment and return the money that was stolen by Discover Bank to me immediately, with sanctions and interest, as I have proven and there is no dispute this Account (X5255) was closed out (and known by Discover Bank) and these assets sent to me on 2/16/18 with Discover Bank issuing a check to me in the amount of \$67,580.55 on said date (Check # 2001192) (EXHIBIT 2), WHICH WERE DEPOSITED INTO Oconee Federal Bank in Oconee County, South Carolina. ALL THESE MONIES WERE FULLY ACCOUNTED FOR TO THE OCONEE COUNTY PROBATE COURT AND ALL OTHER COURTS.

The monies taken/converted by Discover Bank were clearly SOUTH CAROLINA Assets. That is undisputed as well. It is undisputed that Discover Bank did not comply with the UEFJA, which is must do in order to attempt to legally take someone’s assets. It is well established and uncontested these are S.C. assets in many Certifications and that fact uncontested and never even challenged by anyone (See my Certifications in the UEFJA Motion). Also see addresses on these accounts- addressed to me at P.O. Box 503, Walhalla, SC 29691).

This entire little game playing fraudulent and lying misrepresentations and lies regarding the conversion of my personal monies is so egregious and Kravitz and Murphy together have simply lied in order to promote another lie in order to promote another lie, and it is truly despicable, but to this point, they have gotten away with this unethical and despicable conduct- and this is why this type of conduct continues. This Court must hold Kravitz to his written words here- this was an attempted “freeze” or turnover of the funds in Account x5255, and if not, they will never be held to any type of acceptable standard of truth or honesty, and they can just run rampantly through the system, ex parte judges, lying, misrepresenting legal forms ending in torture and death, and your system will remain corrupt and unethical. In this matter, Kravitz, with the aid of Murphy and Discover Bank, HAVE LITERALLY GOTTEN AWAY WITH MURDER- MY MOM’S, and they will not complete their thievery and treachery by stealing my lifetime savings of 41 years of practicing law for no valid reason. I will elaborate on this in my Certification- just how corrupt, unethical, inappropriate this all was. Kravitz and Murphy together are so unethical, and this is exemplified in this little lying charade/they have played on the Court, with my lifetime earnings on the line here- WHEN I HAVE DONE ABSOLUTELY WRONG. Stay tuned for my Certification.

Please consider any Certifications and Memorandums in support of this Motion.

Incidentally, any Court Orders Discover claims were filed with the October 2, 2018 letter were not sent or provided to me by Discover Bank as I requested to Discover- by way of

discovery, in this matter-they ignored that as well- I was not even provided or sent the letter at the time it was allegedly sent, so it is not even proven the letter was sent, or sent at that time- and I am making a Motion to Compel, as Discover is in the same boat as Kravitz as liars, cheaters, unethical and will do anything and everything to win, including not serve pleadings (Kravitz), ex parte judges, lie in Certifications, steal others' money, etc., all of which they've done, so I will be making A Motion to Compel. I am also doing a Motion to Reconsider and/or Vacate the Court's recent Order regarding Discover Bank, and if need be getting relief from the 3rd Circuit on that. Discover Bank has not even proven this October 2, 2018 letter was even sent or received, or when, and I requested that. The first time I ever saw this letter was when this Interpleader was filed, after South Carolina ruled that my monies should be returned and they were held in Contempt, and then they Ex Parte the Judge and got an Ex Parte Order staying their sanctions; so nothing that Kravitz or Discover Bank says or does should be given any credibility. This was a plain old fashioned unethical myriad of lies, deception, fraud and conversion by Discover and Greenwood House, in a corrupt Court and jurisdiction that allows this. Focusing on the ONE SIMPLE REQUEST BY KRAVITZ FOR A FREEZE OR TURNOVER ON ACCOUNT x5255, IT IS UNDISPUTED THAT ACCOUNT WAS CLOSED OUT, AND IT IS UNDISPUTED THAT INSTEAD OF DISCOVER BANK SIMPLY INFORMING KRAVITZ THAT (IF HE DIDN'T ALREADY KNOW, AND I THINK HE DID, AND THIS WAS JUST A JOINT LYING VENTURE INVOLVING DISCOVER BANK, AND CORRUPT AND UNETHICAL KRAVITZ), AND THAT ENDING THIS MATTER, THEY ILLEGALLY CONVERTED \$300,000 OF MY PERSONAL SOUTH CAROLINA ASSETS, WITH NO LEGAL BASIS OR AUTHORITY TO DO SO, AND IN VIOLATION OF UEFJA. THERE IS NO GENUINE ISSUE OF THE ONE MATERIAL FACT- THAT ACCOUNT x5255 WAS CLOSED OUT AND DISCOVER BANK THEMSELVES SENT ME THE CHECK FOR THAT (EXHIBIT 2), SO SUMMARY JUDGMENT MUST BE GRANTED AND A HEARING FOR SANCTIONS AGAINST DISCOVER BANK AND GREENWOOD HOUSE SHOULD BE SCHEDULED.

AS PERSONAL REPRESENTATIVE OF MY MOM'S ESTATE, I WOULD PRESENT TO THE COURT THAT MY MOM AND HER ESTATE JOIN IN, IN REQUESTING THE COURT GRANT THIS MOTION, AS MY MOM STATED TO HER VISITOR IN THE CONSERVANCY AND GUARDIANSHIP ACTION- A NEW JERSEY NURSE, SHARON WHELOCK, THAT SHE LOVED ME VERY MUCH AND WANTED ME TO MAKE DECISIONS FOR HER (EXHIBIT 8), AND SHE WOULD BE APPALLED AND UPSET BY ALL THESE PROCEEDINGS, WHICH LED TO HER BEING ILLEGALLY HELD IN NEW JERSEY AND HER BEING TORTURED, BLINDED AND BATTERED, AND HER MONEY FLEECE, AND THE DISHONESTY, CORRUPTION AND TOTAL DISREGARD OF HER RIGHTS, INCLUDING HER RIGHT TO LIFE, SHOWN BY THESE NEW JERSEY ATTORNEYS AND COURTS, AND SHE MOST CERTAINLY WOULD NOT WANT HER SON, WHO LOVED HER AND FOUGHT HARD FOR HER THROUGHOUT THESE PROCEEDINGS, AND WAS DEEMED BY THE COURT- THE ONLY VALID AND PROPER COURT- TO BE AN EXCEPTIONAL CAREGIVER FOR HER, TO HAVE HIS PERSONAL MONEY STOLEN FOR NO REASON OTHER THAN TRYING TO STAND UP FOR HER, AND INCREDIBLE GREED AND TOTAL DISHONESTY AND CORRUPTNESS TO ADVANCE GREED, SO THE COURT SHOULD FOR ONCE CONSIDER WHAT MY MOM WOULD WANT DONE. SHE SIGNED 3 SEPARATE VALID POWERS OF ATTORNEY TO ME, MADE ME THE PERSONAL REPRESENTATIVE OF HER ESTATE, TOLD THE VISITOR IN HER PROCEEDINGS SHE LOVED ME VERY MUCH AND WANTED ME TO MANAGE THINGS FOR HER/HER AFFAIRS, AND THIS COURT DID NOT LISTEN TO A WORD SHE SAID

OR HER ACTIONS-JUST DISREGARDED IT- IN DEFERENCE TO PEOPLE WHO WERE FLEEING HER, DISHONEST, GREEDY, INCOMPETENT AND COULDN'T CARE LESS ABOUT HER BEST INTEREST, WELL BEING OR EVEN HER LIFE. FOR ONCE, THIS COURT SHOULD LISTEN TO THE VOICE OF MY MOM- AND GRANT THIS SUMMARY JUDGMENT. IF KRAVITZ HAS A VALID JUDGMENT OR CLAIM, HE CAN CERTAINLY ADVANCE IT- BUT THESE ARE SOUTH CAROLINA ASSETS (SEE EXHIBIT 8- THE 6 BANK STATEMENTS FROM THE ACCOUNTS THE DISCOVER BANK CONVERTED- ALSO SEE CERTIFICATION AND MOTION IN THE UEFJA MOTION MATTER-CONFIRMING-ALL UNDISPUTED-THAT THESE WERE ALL SOUTH CAROLINA ASSETS), AND THE FUNDS CONVERTED BY DISCOVER BANK SHOULD BE RETURNED TO LES SHAYNE, AND IF KRAVITZ WANTS TO PERFECT ANY TYPE OF VALID CLAIM HE THINKS HE HAS, THE UEFJA AND JUSTICE MANDATES, AS SOUTH CAROLINA ASSETS WERE CONVERTED/STOLEN BY DISCOVER BANK WITH NO BASIS OR ANY PROPER LEGAL PROCEDURES, THAT HE DOMESTICATE ANY VALID JUDGMENT KRAVITZ THINKS HE HAS IN SOUTH CAROLINA, WHERE THERE IS JUSTICE AND PEOPLE GET FAIR HEARINGS AND EVEN GET SERVED, AND ARE AFFORDED JUSTICE-INSTEAD OF ASKING FOR A FREEZE ON ACCOUNT X5255 (APPROXIMATELY \$65,000) AND INSTEAD CORRUPT DISHONEST FLUNKIE OF CORRUPT UNETHICAL KRAVITZ, DAVID MURPHY, OF THE CORRUPT AND UNETHICAL DISCOVER BANK TEAM OF BANDITS, THIEVES AND LIARS, CONVERTS/STEALS \$300,000 OF MY PERSONAL FUNDS, ALL MY LIQUID SAVINGS OF 41 YEARS OF PRACTICING LAW. AS PERSONAL REPRESENTATIVE OF MY MOM'S ESTATE, I WOULD PRESENT TO THE COURT THAT MY MOM AND HER ESTATE JOIN IN, IN REQUESTING THE COURT GRANT THIS MOTION, AS MY MOM SHE STATED TO HER VISITOR (SHARON WHELOCK-EXHIBIT 9) THAT SHE LOVED ME VERY MUCH AND SHE CERTAINLY WOULD NOT WANT HER SON, WHO LOVED HER AND FOUGHT HARD FOR HER THROUGHOUT THIS ENTIRE CORRUPT AND KILLING PROCEEDING, TO HAVE ALL HIS PERSONAL LIQUID SAVINGS OF 41 YEARS STOLEN BY DISCOVER BANK AND KRAVITZ FOR NO REASON OTHER THAN TRYING TO STAND UP FOR HER AND GREED AND DISHONESTY OF KRAVITZ AND MURPHY.

THAT I AM CLEARLY ENTITLED TO SUMMARY JUDGMENT AND THE IMMEDIATE RETURN OF MY MONIES, WITH INTEREST AND WITH SANCTIONS ON DISCOVER BANK AND GREENWOOD HOUSE.

AND IT IS SO MOVED!

Respectfully submitted,



Les Shayne, Defendant, Pro Se and on
Behalf of the Estate of Charlotte Shayne

June 12, 2023
Walhalla, SC